

EXHIBIT – A

SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

RAYNARD D. GROSS, individually,

Plaintiff,

v.

INTERNATIONAL STAGE LINES, INC.,

Defendant.

NO.

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, by and through his attorney of record, and by way of claim allege, and upon information and belief upon all other matters, as follows:

I. PARTIES

1. Plaintiff Raynard D. Gross is an adult male residing in the State of Washington.

2. Defendant International Stage Lines, Inc. is a corporation that operated the tour bus that struck Mr. Gross.

II. FACTS

3. As depicted below, Mr. Gross was struck by a bus operated by International Stage Lines, Inc:



4. The police report summarized the facts giving rise to the accident:

Report Number: E685615

Narrative

Vehicle #1 was stopped in the outside lane of SB International Blvd. for a red traffic control signal at the intersection with S. 188th St. The pedestrian was crossing International Blvd. from east-to-west, on the north side of the intersection with S. 188th St. When the light cycled to green the bus proceeded forward and stopped a short distance in the crosswalk after the driver felt a bump and was flagged down. The pedestrian had been struck by the front, right wheel and suffered an extensive pelvic injury. Driver #1 and two passengers did not see the pedestrian prior to the collision. Preliminary information at the scene suggested that the pedestrian may not have been travelling in the marked crosswalk.

Vehicle #1 was released to the driver at the scene. The pedestrian was transported to Harborview Medical Center for treatment and further evaluation.

(This is a preliminary report. Further investigation to be completed under KCSO follow-up case #C17031141)

5. As a result, Mr. Gross suffered debilitating injuries to the degree that rendered him incapacitated as defined under RCW 4.16.190 for an extended period of time including incurring a TBI.

6. Specifically, according to Mr. Gross's treating physician, Carolin Hagedorn, M.D., as of February 8, 2018: "*He has ABSOLUTELY no insight into his situation/medical condition.*"

1 7. As of February 19, 2019, Dr. Hagedorn noted that *"It is difficult to impossible*
2 *to explain all of these things to him due to his mental capacity..."*

3 8. Mr. Gross remains relegated to a lifetime of nursing as a consequence of his
4 catastrophic injuries.

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6 **III. NEGLIGENCE**

7 9. Mr. Gross was seriously injured as a result of the negligence of International
8 Stage Lines, Inc.

9 **IV. PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff requests a judgment against Defendant:

- 11 (a) Awarding Plaintiff general damages and special damages in an amount to be
12 proven at trial;
13 (b) Awarding him reasonable attorney's fees and costs as available under law;
14 (c) Awarding him any and all applicable interest on the judgment; and
15 (d) Awarding him such other and further relief as the Court deems just and proper
16 under the circumstances of this cases.
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2 DATED this 4th day of February, 2021.

3 CONNELLY LAW OFFICES, PLLC

4 *Lincoln Beauregard*

5 By

6 Lincoln C. Beauregard, WSBA No. 32878

7 Attorney for Plaintiff

8 SEARS INJURY LAW, PLLC

9 *Robert Sears*

10 By

11 Lincoln C. Beauregard, WSBA No. 52828

12 Attorney for Plaintiff